

JAP:MRM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

JAMIE MACIAS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW DOYLE, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about January 25, 2017, within the Eastern District of New York and elsewhere, the defendant JAMIE MACIAS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and belief are as follows:¹

1. On or about January 25, 2017, the defendant JAMIE MACIAS arrived at John F. Kennedy Airport (“JFK”) in Queens, New York, aboard Tame Airlines Flight EQ550 from Guayaquil, Ecuador.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. Upon her arrival at JFK, the defendant JAMIE MACIAS was selected for an enforcement examination by United States Customs and Border Protection (“CBP”) officers. The defendant presented one black “Sttelli” bag and its contents. The defendant stated that the bag belonged to him and that he had not been given anything to carry into the United States. The defendant stated that he had purchased some canned food.

3. During the examination CBP officers searched the “Sttelli” bag and discovered that it contained 6 cans of food, three of which were labelled as corn and three as tuna. When CBP officers examined the cans, the defendant exhibited nervous behavior. A further probe revealed that the objects contained a white paste with a strong chemical odor, which field-tested positive for cocaine. A gross weight of 3,378 grams of cocaine were seized.

WHEREFORE, your deponent respectfully requests that the defendant JAMIE MACIAS be dealt with according to law.

Dated: Brooklyn, New York
January 25, 2017



Matthew Doyle
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
25th day of January, 2017

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK